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RECEIVED

JUN 26 2013

PUBLIC SERVICE COMMISSION

Via Overnight Mail

June 25, 2013

Mr. Jeff Derouen, Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, Kentucky 40602

Re: Case No. 2013-00167

Dear Mr. Derouen:

Please find enclosed the original and ten (10) copies of KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC's PETITION TO INTERVENE for filing in the above-referenced docket.

By copy of this letter, all parties listed on the Certificate of Service have been served. Please place this document of file.

Very Truly Yours,

David F. Boehm, Esq.

BOEHM, KURTZ & LOWRY

MLKkew Attachment

cc:

Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by mailing a true and correct copy via electronic mail (when available) and regular U.S. Mail to all parties on this 25th day of June, 2013.

David F. Boehm, Esq.

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COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the matter of:

: Case No. 2013-00167

Adjustment of Rates Of Columbia Gas Of

Kentucky, Inc.

:

PETITION TO INTERVNE OF KENTUCKY INDUSTRIAL UTILITY CUSTOMERS

Pursuant to 807 KAR 5:001 Sec. 3(8), Kentucky Industrial Utility Customers ("KIUC") hereby respectfully move this Commission for an Order permitting it to intervene and to be a party to the within proceeding, with full intervention status. In support of its Motion, KIUC states as follows:

- (1) KIUC is a group of large manufacturing companies located in the service area of Columbia Gas of Kentucky, Inc. ("Columbia Gas");
- (2) KIUC, as ratepayers of Columbia Gas, transport large amounts of gas under various Columbia Gas rates and tariffs;
- (3) This proceeding involves issues which could effect gas transportation costs and availability, capacity costs and availability and other questions of critical importance to KIUC companies;
- (4) Therefore, KIUC has a substantial interest in the fairness and reasonableness of the rates and charges proposed by Columbia Gas;

(5) Counsel for KIUC in this proceeding and upon whom all notices are to be served are:

David F. Boehm, Esq. BOEHM, KURTZ, & LOWRY 36 E. Seventh Street, Suite 1510 Cincinnati, Ohio 45202

Ph: 513-421-2255 Fax: 513-421-2764 E-Mail: <u>dboehm@BKLlawfirm.com</u>

WHEREFORE, KIUC prays that the Commission grant it full intervention status and make it party to the proceeding herein, allow it to appear by counsel for any and all purposes, and to receive filed testimony, exhibits, pleadings, correspondence, and all other documents submitted by the parties.

Respectfully submitted,

David F. Boehm, Esq.

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COUNSEL FOR KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.

June 25, 2013